

Chemicals for the Information Age

EPA HPV Challenge Keto Acid Category Robust Summaries - Revised

OPPT CBIC

ESCO Company Limited Partnership 2340 Roberts Street Muskegon, Michigan 49443

The Keto Acid Category

Keto Acid Name	Chemical Name	C.A.S. Number
EtKeto Acid	Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]	5809-23-4
BuKeto Acid	Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]	54574-82-2

Physical and Chemical Elements

1. Melting Point

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity >99%

Method

Method	ESCO Company Quality Assurance Laboratory Method
GLP (Yes/No)	No
Year	2002
Remarks	None

Results

Melting Point (°C)	201 - 204°C
Decomposition	No
Sublimation	No
Remarks	None

Conclusions

Remarks: The ESCO Company Quality Assurance Laboratory completes melting point testing on each batch of EtKeto Acid produced.

Data Quality

Remarks: None

References

None

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	OECD Chemical Testing Guideline No. 102
GLP (Yes/No)	No
Year	1991
Remarks	None

Results

Melting Point (°C)	457.5°K (184.3 °C)
Decomposition	No
Sublimation	No
Remarks	A color change was recorded at 446°K

Conclusions

Remarks: None

Data Quality

Remarks: None

References

Inveresk Research International, "Physico Chemical Testing with DBMAP-Keto Acid," May 30, 1991

Other

None

2. Boiling Point

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method	Computer Simulated Model – Estimations Program
	Interface for Windows (EPIWin), MPBPWIN v1.40

GLP (Yes/No)	No
Year	2003
Remarks	Inputs: Melting point 201°C, Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input.

Boiling Point (°C)	480°C
Decomposition	No
Pressure	Atmospheric
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

ESCO Company ran the MPBPWIN Model on November 26, 2003.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 100% for model

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin), MPBPWIN v1.40
GLP (Yes/No)	No
Year	2003
Remarks	Inputs: Melting point 184°C, Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input.

Boiling Point (°C)	526°C
Decomposition	No
Pressure	Atmospheric
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

ESCO Company ran the MPBPWIN Model on November 26, 2003.

Other

None

3. Density (Specific Gravity)

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity >99%

Method

Method	ESCO Company Quality Assurance Laboratory Method
GLP (Yes/No)	No
Year	2002
Remarks	None

Specific Gravity	1.179 g/mL
Temperature (°C)	20°C
Remarks	None

Remarks: The ESCO Company Quality Assurance Laboratory completed specific gravity determinations on EtKeto Acid.

Data Quality

Remarks: None

References

None

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	OECD Chemical Testing Guideline No. 102
GLP (Yes/No)	No
Year	1991
Remarks	None

Results

Specific Gravity	1.179 g/mL
Temperature (°C)	21°C
Remarks	None

Conclusions

Remarks: None.

Data Quality

Remarks: None

References

Inveresk Research International, "Physico Chemical Testing with DBMAP-Keto Acid," May 30, 1991

Other

None

4. Vapor Pressure

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin), MPBPWIN v1.40
GLP (Yes/No)	No
Year	2003
Remarks	None

Results

Vapor Pressure Value	1.76 x 10 ⁻¹⁰ mm Hg at 25°C
Temperature (°C)	25°C
Decomposition	No
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

ESCO Company ran the MPBPWIN Model on November 26, 2003.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin), MPBPWIN v1.40
GLP (Yes/No)	No
Year	2003
Remarks	None

Results

Vapor Pressure Value	1.47 x 10 ⁻¹¹ mm Hg at 25°C
Temperature (°C)	25°C
Decomposition	No
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

ESCO Company ran the MPBPWIN Model on November 26, 2003.

Other

None

5. Partition Coefficient

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method

Method	Calculated using Advanced Chemistry Development (ACD) Software Solaris v4.67
GLP (Yes/No)	No
Year	2003
Remarks	None

Results

Log D	Log D = 3.18 at pH 4.0 Log D = 0.42 at pH 7.0 Log D = -0.27 at pH 8.0
Temperature °C	25°C
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

American Chemistry Society (ACS) Registry using STN.

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

	OECD Chemical Testing Guidelines No. 107. The Flask-Shaking Method and Analytical Method No. 5084
GLP (Yes/No)	No

Year	1991
Remarks	None

	Log $P_{ow} > 5.003$ at pH 5.0 Log $P_{ow} = 2.670$ at pH 7.0 Log $P_{ow} = 1.645$ at pH 9.0
Temperature °C	20°C
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

Inveresk Research International, "Physico Chemical Testing with DBMAP- Keto Acid," May 30,1991.

Other

None

6. Water Solubility

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method	Calculated using Advanced Chemistry Development (ACD) Software Solaris v4.67
GLP (Yes/No)	No
Year	2003
Remarks	None

Value (mg/L) at	Not provided
temperature °C	
Description of	Sparingly soluble at 25°C and pH 4.0
solubility	Slightly soluble at 25°C and pH 7.0
	Soluble at 25°C and pH 8.0
Remarks	None

Conclusions

Remarks: None

Data Quality

Remarks: None

References

American Chemistry Society (ACS) Registry using STN.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	OECD Test Guideline No. 105
GLP (Yes/No)	No
Year	1991
Remarks	None

Value (mg/L) at temperature °C	0.000137 kg/m³ at 30°C and pH 5.0 0.0298 kg/m³ at 30°C and pH 7.0 1.645 kg/m³ at 30°C and pH 9.0
Description of solubility	Not described

	0.000137 kg/m ³ at 30°C and pH 5.0 0.0298 kg/m ³ at 30°C and pH 7.0 1.645 kg/m ³ at 30°C and pH 9.0
pKa Value at 25°C	None provided
Remarks	None

Remarks: None

Data Quality

Remarks: None

References

Inveresk Research International, "Physico Chemical Testing with DBMAP- Keto Acid," May 30,1991.

Other

None

7. pKa Value

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.96%

Method

Method	OECD Guideline 112
GLP (Yes/No)	Yes
Year	2001
Remarks	None

pKa Value at 25°C	See remarks and conclusion sections
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Remarks	"The aqueous test solutions were insoluble, so an additional amount of co-solvent was used in an attempt to increase solubility of the test substance in the methanol test solution. The extra addition of solvent (> 20%) did not increase the solubility of BuKeto Acid in water.
	An approximation of the pKa value using pure solvent was determined not to be an appropriate comparison to an aqueous solution found in the natural environment."

Remarks: "BuKeto Acid is not soluble in water even with the addition of a solvent, therefore the OECD 112 Dissociation Guideline Test can not be performed. Dissociation of BuKeto Acid will not be a significant factor in the natural environment, since it will not dissolve in water at any appreciable levels."

Data Quality

Remarks: None

References

Springborn Laboratories, Inc., "BuKeto Acid – Determination of the Dissociation Constant," September 6, 2001.

Other

None

8. Adsorption/Desorption to Soil

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	OECD Draft Document; "Estimation of the Adsorption Coefficient (K _{OC}) on Soil and Sewage Sludge Using High Performance Liquid Chromatography (HPLC)"
GLP (Yes/No)	Yes
Year	1999
Remarks	None

Adsorption Coefficient (K _{OC})	"The adsorption coefficient was determined to be log K_{OC} 2.02."
Remarks	None

Conclusions

Remarks: "The adsorption coefficient was determined to be log K_{OC} 2.02."

Data Quality

Remarks: None

References

Inveresk Research, "DBMAP-Ketoacid Estimation of Adsorption Coefficient (K_{OC}) by HPLC Method," October 8,1999.

Other

None

Environmental Fate and Pathway Elements

9. Photodegradation

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin)
GLP (Yes/No)	Computer Model
Year	2003
Remarks	None

Half-life (t ^{1/2})	0.05 days
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Degradation % after	Not provided
Breakdown products	Not provided
Remarks	Used Simplified Molecular Input Line Entry System
	(SMILES) to design the chemical structure input.

Remarks: The oxidation program predicts the half-life of EtKeto Acid to be very short in air. The AOP program predicts the rate at which the test substance will react with air-borne hydroxyl radicals formed through photochemical reactions. This is the most common type of reaction that organic chemicals undergo in relation to photolysis in air. Although the half-life in air is very short, degradation in air is not expected to be a major degradation pathway since the compound is not particularly volatile.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin)	
GLP (Yes/No)	Computer Model	
Year	2003	
Remarks	None	

Half-life (t ^{1/2})	0.05 days
Degradation % after	Not provided

Breakdown products	Not provided	
	Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input.	

Remarks: The oxidation program predicts the half-life of BuKeto Acid to be very short in air. The AOP program predicts the rate at which the test substance will react with air-borne hydroxyl radicals formed through photochemical reactions. This is the most common type of reaction that organic chemicals undergo in relation to photolysis in air. Although the half-life in air is very short, degradation in air is not expected to be a major degradation pathway since the compound is not particularly volatile.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

10. Stability in Water

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin)	
GLP (Yes/No)	Computer Model	
Year	2003	
Remarks	Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input.	

Half-life (t ^{1/2})	38 days
Degradation % after	Not provided
Breakdown products	Not provided
Remarks	None

Remarks: The aqueous hydrolysis rate program could not calculate a hydrolytic rate constant for EtKeto Acid since it is not classified as an ester, carbamate, epoxide, halmethane, or alkyl halide. Hydrolysis is not likely to be a major pathway for degradation of EtKeto Acid since the solubility of EtKeto Acid in water is so low. Hydrolysis is unlikely because the molecules contain no hydrolyzable functions.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin)	
GLP (Yes/No)	Computer Model	
Year	2003	
Remarks	Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input.	

Half-life (t ^{1/2})	15 days
Degradation % after	Not provided

Breakdown products	Not provided
Remarks	None

Remarks: The aqueous hydrolysis rate program could not calculate a hydrolic rate constant for BuKeto Acid since it is not classified as an ester, carbamate, epoxide, halmethane, or alkyl halide. Hydrolysis is not likely to be a major pathway for degradation of BuKeto Acid since the solubility of BuKeto Acid in water is so low. Hydrolysis is unlikely because the molecules contain no hydrolyzable functions.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

11. Transport Between Environmental Compartments (Fugacity)

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin), (Level III Fugacity Model)
GLP (Yes/No)	Computer Model
Year	2003
Remarks	Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input. Physical Property Inputs: Melting Point: 201°C

Media	Air, Water, Soil, and Sediment	
Estimated	Environmental Distribution	
Distribution and	Air:	0.0002%
Media Concentration	Water:	19.9%
	Soil:	78.4%
	Sediment:	1.74%
	Persistence:	44 days
	Waste Water Tr	eatment Removal
	Air:	0.00%
	Adsorption:	21.22%
	Biodegradation:	
	Total Removal:	21.47%
	Environmental Half-Life	
	Air:	0.05 days
	Water:	38.0 days
	Soil:	38.0 days
	Sediment:	150.0 days
	Predicted Parameters	
	Hydrolysis: Can not estimate Atmospheric Oxidation: 35 minutes Biodegradation: Biowin Estimate: 2.374 Weeks	
	Adsorption: K _{oc}	= 277
Remarks	None	

Remarks: EtKeto Acid is predicted to bind to soil after entering the natural environment. EtKeto Acid is not predicted to readily biodegrade.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 100% for model

Method

Method	Computer Simulated Model – Estimations Program Interface for Windows (EPIWin), (Level III Fugacity Model)	
GLP (Yes/No)	Computer Model	
Year	2003	
Remarks	Used Simplified Molecular Input Line Entry System (SMILES) to design the chemical structure input. Physical Property Inputs: Water Solubility: 0.0298 mg/l, Log K _{ow} (octanol /water): 2.67, Melting Point: 184°C	

Media	Air, Water, Soil, and Sediment	
Estimated	Environmental Distribution	
Distribution and	Air:	0.02%
Media Concentration	Water:	30.2%
	Soil:	69.6%
	Sediment:	0.2%
	Persistence:	18 days
	Waste Water Ti	reatment Removal
	Air:	0.00%
	Adsorption:	
	Biodegradation: 0.11%	
	Total Removal:	3.68%
	Environmental Half-Life	
	Air:	0.05 days
	Water:	·
	Soil:	15.0 days
	Sediment:	60.0 days
	Predicted Parameters	
	Hydrolysis: Can not estimate	
	Atmospheric Oxidation: 34 minutes	
	Biodegradation: Biowin Estimate: 2.846 Weeks	
	Adsorption: Stro	ong (K _{oc} = 3205)

Pemarke	None
Remarks	INONE

Remarks: BuKeto Acid is predicted to bind significantly to soil after entering the natural environment. BuKeto Acid is not predicted to readily biodegrade.

Data Quality

Remarks: None

References

ESCO Company ran the EPIWin Model on April 24, 2003.

Other

None

12. Biodegradation

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.96%

Method

Method	OECD Guideline for Testing of Chemicals No. 301B
Test Type	Aerobic
GLP (Yes/No)	Yes
Year	2001
Contact Time	28 days
Innoculum	Activated Sewage Sludge Bacteria
Remarks	None

Degradation % after time	BuKeto Acid did not biodegrade during the 28 day study.
Results	BuKeto Acid may not be classified as readily biodegradable.
Kinetic	Sodium benzoate attained 60% biodegradation within 28 days

Breakdown Products	No
	There was no evidence of inhibitory effects under the conditions of this test.

Remarks: "Based on the CO₂ analysis, BuKeto Acid cannot be classified as readily biodegradable under OECD guidelines since it did not biodegrade during the 28 day study."

Data Quality

Remarks: None

References

Springborn Laboratories, Inc., "BuKeto Acid – Determination of the Biodegradability by CO₂ Evolution Modified Sturm Test," August 8, 2001.

Other

None

Ecotoxicity Elements

13. Acute Toxicity to Fish

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Determination of Acute Toxicity (LC ₅₀) to Rainbow Trout (96 H, Static). Consistent with OECD Guideline for Testing Chemicals No. 203
Test Type	Acute toxicity to rainbow trout under static conditions.
GLP (Yes/No)	Yes
Year	1990
Analytical Monitoring	High Performance Liquid Chromatography (HPLC)
Species/Strain/ Supplier	Rainbow trout (<i>Salmo gairdneri</i>). Source: Cloan Hatcheries, Auchterarder, Scotland
Exposure period	96 hours

Statistical Methods	"The 96 h LC ₅₀ value, with 95% confidence limits, will be determined by probit analysis. Where possible 24, 48, and 72 h LC ₅₀ values will also be calculated. The 96 h LC ₅₀ may also be determined graphically."
Remarks	Water Quality Parameters: • pH: Ranged from 7.6 to 8.1 • Temperature (°C): 12.2 to 12.9 • Conductivity (mS): 0.17 to 0.20 • Dissolved Oxygen (%): 81 to 89

Nominal	0, 62.5, 125, 250, 500, 1000 p.p.m.
Concentrations	
Measured	0, 1.7, 2.8, 7.1, 8.6, 29.4 p.p.m.
Concentrations	
Unit	p.p.m.
Element Value	24 hour LC_{50} = 22.3 p.p.m., 48 hour LC_{50} = 16.3 p.p.m., 72 hour LC_{50} = 16.3 p.p.m., 96 hour LC_{50} = 16.3 p.p.m.
Statistical Results	"The 95% confidence limits were not calculable since the data distribution does not fit the probit model used."
Remarks	None

Conclusions

Remarks: "These results are based on mean measured concentrations of BuKeto Acid. The highest mean measured concentration tested causing no mortalities within the test period was 8.6 p.p.m. The lowest mean measured concentration tested causing any mortalities within the test period was 29.4 p.p.m. The lowest mean measured concentration tested causing 100% mortalities within the test period was 29.4 p.p.m."

Data Quality

Remarks: None

References

Inveresk Research International, "DBMAP KETOACID Determination of Acute Toxicity (LC₅₀) to Rainbow Trout (96 h, Static)," November 12, 1990.

Other

None

14. Prolonged Toxicity to Fish

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	OECD Guideline, Fish Juvenile Growth Test – 28 days (November 1994)
Test Type	Prolonged toxicity to rainbow trout under semi-static conditions.
GLP (Yes/No)	Yes
Year	1998
Analytical Monitoring	High Performance Liquid Chromatography (HPLC)
Species/Strain/ Supplier	Rainbow trout (<i>Oncorhynchus mykiss</i>). Source: Selcoth Fish Farm, Moffat, Scotland
Exposure period	28 days
Statistical Methods	"In calculation of EC ₂₀ values (i.e. the concentration resulting in a 20% decrease in growth rate), the tank average growth rates were plotted against concentration to examine the concentration response relationship. A simple regression of growth rate on concentration was fitted to the tank average growth rates. For each interval the EC ₂₀ was calculated. Berkson's modification was applied to the mortality data prior to analysis (due to lack of fractional mortality). A probit transformation was applied to the modified data for each day separately. The probit transformed data was applied to the modified data for each day separately. The probit transformed data was then subjected to a regression procedure against the logarithmically transformed concentrations of test material. From the fitted models, the LC ₅₀ values were estimated for each day. As Berkson's modification was applied, no confidence limits have been presented."
Remarks	Water Quality Parameters: • pH: Ranged from 6.90 to 7.92 • Temperature (°C): 12.7 to 14.5 • Conductivity (mS): 0.17 to 0.26
	Dissolved Oxygen (%): 71 to 97

Nominal Concentrations	0, 5, 15.8, 50, 158, and 500 mg/L
Measured Concentrations	0, 0.12, 0.40, 1.32, 4.50, and 19.2 mg/L
Unit	mg/L
Element Value	EC_{20} = 6.5 mg/l at 14-28 days, EC_{20} = 10.5 mg/l at 0-28 days based on mean measured concentrations. EC_{50} for mortality was found to be 14.6 mg/L, 10.4 mg/L and 9.3 mg/L for Days 2,3, and 4 respectively LC_{50} = 14.6 mg/l at 2 days, LC_{50} = 10.4 at 3 days, LC_{50} = 9.3 at 4-28 days.
Remarks	"Analysis of test material concentrations indicated that BuKeto Acid was unstable over the 48 hour test solution replacement period at all test concentrations. This instability may be due to hydrolysis, degradation, or binding to glass or fish."

Conclusions

Remarks: "All fish at 19.2 mg/l died within 4 days of exposure and as such could not be included in the growth rate calculations. The only other mortality during the test period was in one solvent control replicate, where one fish escaped from the tank." The 28 day $LC_{50} = 9.3 \text{ mg/L}$

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid - Rainbow Trout, Juvenile Growth Test (28 day, Semi-Static)," December 30, 1998.

Other

None

15. Acute Toxicity to Aquatic Plants (e.g. Algae)

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.9%

Method	OECD Guideline for Testing Chemicals No. 201
Test Type	Algae growth inhibition test on BuKeto Acid, Static conditions
GLP (Yes/No)	Yes
Year	1997
Species/Strain # and	Selenastrum capricornutum, Strain No.: CCAP 278/4,
Source	Source: Culture Collection of Algae and Protozoa
	(CCAP), Ambleside, Cumbria
Element Basis	Cell count/mL, area under the curve, and specific growth rate
Exposure period	72 hours
Analytical Monitoring	High Performance Liquid Chromatography (HPLC)
Statistical Methods	"The area under the growth curve and growth rate values were analyzed for homogeneity of variance using Levene's test (Levene, 1960) at 1% significance level. If the group variances appeared homogeneous, the area under the curve and growth rate values were analyzed using analysis of variance (ANOVA) techniques. Following ANOVA, pairwise comparisons were performed between control and each measured concentration of test material using Dunnett's procedure (Dunnett, 1964) at 5% significance level. If the group's variances appeared heterogeneous, log or square root transformations were used in an attempt to stabilize the variances. If the variances remained heterogeneous Dunn's test (Dunn, 1964), a distribution-free multiple comparisons procedure based on Kruskal-Wallis rank sums, was used. The NOEC was calculated for area under growth curves and average specific growth rates using Dunnett's or Dunn's test at 5% significance level. Tests used in the calculation of the NOEC were 2-tailed. The EC50 value (i.e. the concentration of test material which reduces growth by 50%) was calculated where possible from average specific growth rates and areas under growth curves (estimate of biomass) by probit analysis (Finney, 1971) and is shown in table 3. The fit of the probit model to the area under growth curve and growth rate data was checked via the Pearson chisquare test statistic."

Remarks	Water Quality Parameters:
	pH: Ranged from 7.4 to 8.3
	Temperature (°C): 21 to 23

Nominal	0, 1.2, 3.7, 11.1, 33.3, 100 p.p.m.
Concentrations	
Measured	0, 0.374, 1.311, 12.943, 23.805, 62.155 p.p.m.
Concentrations	
Unit	p.p.m.
Element Value	Mean Cell Concentrations (x10 ⁵ cells/ml)
	Mean measured concentrations of BuKeto (p.p.m.)
	Time 0 0.374 1.311 12.943 23.805 62.155
	Ohr 0.07 0.07 0.07 0.07 0.07
	24hr 0.45 0.38 0.34 0.25 0.26 0.21
	48hr 2.67 2.84 2.39 0.92 0.60 0.23
	72hr 18.85 20.25 14.69 3.96 1.65 0.27
	Average Specific Growth Rate (µave/day)
	Mean measured concentrations of BuKeto (p.p.m.)
	Time 0 0.374 1.311 12.943 23.805 62.155
	0-24hr 1.84 1.67 1.57 1.27 1.30 1.10
	0-48hr 1.81 1.84 1.77 1.28 1.06 0.59
	0-72hr 1.86 1.88 1.78 1.34 1.03 0.42
	A
	Area Under Growth Curve (AUC) (x10 ⁴ cells.h/ml)
	Mean measured concentrations of BuKeto (p.p.m.)
	Time 0 0.374 1.311 12.943 23.805 62.155
	0-24hr 0.19 0.15 0.13 0.09 0.10 0.07
	0-48hr 0.84 0.85 0.71 0.30 0.23 0.11
	0-72hr 4.12 4.39 3.30 0.99 0.51 0.13
	Average Specific Growth Rate (µave/day)
	0-48 hours $EC_{50} = 31.47 \text{ p.p.m. NOEC} = 1.311 \text{ p.p.m.}$
	0-72 hours $EC_{50} = 25.73 \text{ p.p.m. NOEC} = 1.311 \text{ p.p.m.}$
	Area Under Growth Curve (AUC)
	0-48 hours $EC_{50} = 8.62 \text{ p.p.m.}$ NOEC = 1.311 p.p.m.
	0-72 hours $EC_{50} = 5.02 \text{ p.p.m.}$ NOEC = 1.311 p.p.m.

Statistical Results	95	95% Confidence Intervals EC ₅₀ Value	
	Average Specific Growth Rate (µave/day)		
		Lower Limit	Upper Limit
	0-48 hours	25.14 p.p.m.	40.85 p.p.m.
	0-72 hours	20.88 p.p.m.	32.32 p.p.m.
	Area Under	Growth Curve (A	UC)
		Lower Limit	<u>Upper Limit</u>
		6.86 p.p.m.	• •
	0-72 hours	4.05 p.p.m.	6.15 p.p.m.
Remarks	"At the highe	er nominal concei	ntrations, the measured
	concentration	ns of BuKeto Aci	d were acutely affected by
	the time dependant change in pH observed with algal		
	cultures." "I	t is concluded tha	at the increase in test
	concentrations observed at the higher levels was a		
	result of incr	reasing solubility	as the pH increased."

Remarks: The EC₅₀ value at 72 hours is 25.73 p.p.m. The NOEC is 1.311 p.p.m.

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid – Alga, Growth Inhibition Test (72 h, EC₅₀)," April 15, 1997.

Other

None

16. Acute Toxicity to Aquatic Invertebrates

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Determination of Acute Toxicity (EC ₅₀) to Daphnia (48 H, Static). Consistent with OECD Guideline for Testing Chemicals No. 202
Test Type	The acute toxicity (EC ₅₀) of BuKeto Acid to Daphnia was determined over a 48 hour period, under static conditions.
GLP (Yes/No)	Yes
Year	1991
Species/Strain/ Supplier	Daphnia magna. "They were bred within the laboratory by acyclical parthenogenesis and the individuals used were between 6 and 24 hours old."
Analytical Monitoring	High Performance Liquid Chromatography (HPLC)
Exposure Period	48 hours
Statistical Methods	"The median effective concentration (EC50) at 24 h and 48 h was determine using probit analysis."
Remarks	Water Quality Parameters: • pH: Ranged from 8.3 to 8.4 • Temperature (°C): 19.0 to 19.5 • Conductivity (mS): 0.51 to 0.63 • Dissolved Oxygen (%): 61 to 75

Nominal Concentrations	0, 62.5, 125, 250, 500, and 1000 p.p.m.	
Measured Concentrations (p.p.m.)	0, 4.3, 10.1, 24.3, 48.0, and 97.1 p.p.m.	
Unit	p.p.m.	
Element Value	24 hour EC_{50} value = 65.8 p.p.m. 48 hour EC_{50} value = 36.3 p.p.m.	
Statistical Results	95% Confidence Intervals EC ₅₀ Value Lower Limit 24 hours 55.8 p.p.m. 77.9 p.p.m. 48 hours Not calculable since the data distribution does not fit the probit model used. The 48 hour EC ₅₀ value was also calculated graphically as 36.4 p.p.m.	
Remarks	The numbers of immobile <i>Daphnia</i> recorded during the study after 24 hours was 3 at 48.0 ppm, and 18 at 97.1 ppm. The numbers of immobile <i>Daphnia</i> recorded during the study after 48 hours was 19 at 48.0 ppm, and 20 at 97.1 ppm.	

Remarks: "Results are based on values of the mean measured concentrations of BuKeto Acid. The highest mean measured concentration tested causing no immobilization within the test period was 24.3 p.p.m.

The lowest mean measured concentration causing any immobilization within the test period was 48.0 p.p.m.

The lowest mean measured concentration tested causing 100% immobilization within the test period was 97.1 p.p.m."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid – Determination of Acute Toxicity (EC_{50}) to Daphnia (48 h, Static)," July 10, 1991.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	OECD Guidelines for Testing Chemicals No. 202	
Test Type	A 21-day semi-static reproduction test of BuKeto Acid	
	with <i>Daphnia magna</i> was conducted.	
GLP (Yes/No)	Yes	
Year	1998	
Species/Strain/ Supplier	Daphnia magna. "They were bred within the laboratory by acyclical parthenogenesis. The individuals used were between 6 and 24 hours old at test initiation."	
Analytical Monitoring	High Performance Liquid Chromatography (HPLC)	
Exposure Period	21 days	
Statistical Methods	The No Observed Effect Concentration (NOEC) for mean number of offspring produced per reproducing <i>Daphnia</i> was calculated at 14 days and 21 days using	

data from all replicate tanks. The cumulative number of offspring per reproducing adult data were analyzed separately for homogeneity of variance using Levene's Test (Leven, 1960) at 1% significance level. As the groups appeared homogeneous, these data were analyzed using analysis of variance (ANOVA) techniques (Snedecor and Cochran, 1980). Using the error of variance from the ANOVA, pairwise comparisons between control and treated groups were performed using one-tailed Dunnett's Test (Dunnett, 1964) at 5% significance level. The NOEC is defined as the highest concentration which is not significantly different from the control at the 5% significance level using the on-tailed Dunnett's test.

To calculate the EC₅₀ value for reproduction, the mean cumulative number of offspring per producing adult was calculated for each concentration. Using Wadley's adjustment (Finney, 1971) for natural mortality, a probit transformation was applied to these data. Where necessary Berkson's modification was also applied. The probit transformed data were then subjected to a regression procedure against logarithmically transformed concentrations of test material with a Newton-Raphson maximum likelihood iterative procedure being made to obtain parameter estimates (Finney, 1971). Persons chi-squared goodness-of-fit statistic was used to assess the fit of the model. From the fitted model, the EC₅₀ value was estimated together with the associated confidence limits where possible. The NOEC for immobilization of adult Daphnia was calculated by comparing the cumulative number of immobile adult daphnia at each concentration with that observed in the controls using Fisher's Exact Test (Fisher, 1950).

To calculate the EC_{50} value for immobilization of adult *Daphnia*, the cumulative number of immobile animals were subjected to probit transformation. Where there were less than two concentrations exhibiting fractional mortality data, Berkson's modification (Berkson, 1953) was applied. The probit transformed data were then subjected to a regression procedure as described above. From the fitted model, the EC_{50} value was estimated together with the associated confidence limits where possible."

Remarks

None

Nominal Concentrations	0, 3.16, 10, 31.6, 100, 316 mg/L
Measured Concentrations (mg/L)	0, 0.36, 1.18, 3.46, 11.79, 35.71 mg/L
Unit	mg/L
Element Value	$\frac{\text{EC}_{50} \text{ Values for Immobilization of Adult } Daphnia}{0\text{-}14 \text{ days } \text{EC}_{50} > 35.71 \text{ mg/L}} \\ 21 \text{ days } \text{EC}_{50} = 19.16 \text{ mg/L}} \\ \frac{\text{EC}_{50} \text{ Values for Reproduction}}{14 \text{ days } \text{EC}_{50} = 18.96 \text{ mg/L}} \\ 21 \text{ days } \text{EC}_{50} = 14.47 \text{ mg/L}} \\ \text{"The NOEC for reproduction was calculated as 31.6 mg/L nominal (3.46 mg/L measured) at Day 14 and Day 21." "The NOEC for adult immobilization was calculated as 316 mg/L nominal (35.71 mg/L measured) at Day 0 to Day 2 and 100 mg/L nominal (11.79 mg/L measured) at Day 3 to Day 21."}$
Statistical Results	95% Confidence Intervals EC ₅₀ Value for Reproduction Lower Limit 14 days 12.96 mg/L 21 days Not calculable as Berkson's modification was applied to the data.
Remarks	None

Conclusions

Remarks: The 21 day EC $_{50}$ Value for Immobilization of Adult *Daphnia* is 19.16 mg/L. The 21 day EC $_{50}$ Value for Reproduction is 14.47 mg/L. The NOEC for immobilization was calculated as 35.71 mg/L at Day 0 to Day 2 and 11.79 mg/L at Day 3 to Day 21.The NOEC for reproduction was calculated as 3.46 mg/L at Day 14 and Day 21.

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid – Daphnia Reproduction Test (21 Day, Semi-Static)," July 2, 1998.

Other

None

17. Toxicity to Terrestrial Organisms

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	OECD Guideline for Testing Chemicals No. 207
Test Type	Acute toxicity test to earthworm
GLP (Yes/No)	Yes
Year	1998
Species and Source	Eisenia foetida andrei, Source: Blades Biological, Kent
Element Basis	Weight loss, and mortality
Exposure period	14 days
Statistical Methods	"The weights of the individual worms in the test and control vessels were recorded, and the mean and standard deviation determined, for each vessel. The mean body weight for each treatment group was calculated at Day 0 and day 14 and the percentage weight loss calculated. Weights were checked for significance of difference between test and control worms over the 14 day test period, using a one-way analysis of variance."
Remarks	None

Concentrations	0, 1, 10, 100, and 1000 mg/kg
Unit	mg/kg
Element Value	"As there were not mortalities in the test vessels, it is concluded that the LC_{50} of BuKeto Acid to earthworms is greater that 1000 mg/kg under the conditions of the test."
Statistical Results	"The results at the end of the 14 day period showed that BuKeto Acid had no effect on earthworm survival."

Remarks	"As the mortalities in the control vessels by the end of
	the test were less than 10%, the test is considered valid.
	No unusual behavior or pathological signs were noted in
	test and control vessels throughout the test period."

Remarks: "As there were not mortalities in the test vessels, it is concluded that the LC_{50} of BuKeto Acid to earthworms is greater that 1000 mg/kg under the conditions of the test."

"After 14 days the mean changes in weight for the test and control worms were – 0.017 g and +0.020 g respectively. This difference in weight change between the test and control worms was found to be statistically significant (P-value from the analysis of variance = 0.0003). Although this would infer that BuKeto Acid has a sub-acute effect at 1000 mg/kg under the test conditions, it should be noted that the worms were not fed during the study and the weight differences may not be biologically significant."

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid – Determination of Acute Toxicity to Earthworms (14 Day, Limit Test)," August 12, 1998.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2)

Method	The effects of BuKeto Acid upon the germination (emergence) and growth of seedlings of wheat (<i>Triticum aestivum</i>), radish (<i>Raphanus sativus</i>), and mung bean(<i>Phaseolus aureus</i>).
Test Type	Terrestrial Plants, Growth Test
GLP (Yes/No)	Yes
Year	1998

Species, Variety, and Source	Crop Wheat Radish Mung Bean	Variety Riband Scarlet Globe Phaseolus aureus	Source Dods of Haddington Strawberry Corner Real foods
Element Basis	"Pots were of effects."	observed daily for em	nergence and phytotoxic
Exposure period	and mung b These repre	eans and 18 days aft	s after sowing for wheat ter sowing for radish. least 50% emergence I pots."
Statistical Methods	and growth in limits where The goodne checked via significant classificant classificant expected intervals have	possible, by probit a ss of fit of the probit i the Pearson chi-squ hi-squared test statis	with 95% confidence nalysis. model to the data was ared test statistic. A tic indicated etween the observed ases, no confidence
Remarks	None		

Concentrations	0, 1.0, 10, 100 mg/Kg
Unit	mg/Kg
Results	"The LC_{50} for emergence and EC_{50} for growth rate were both greater that the highest concentration tested, 100 mg/kg, in wheat and mung bean. In radish, the LC_{50} for emergence was greater that the highest concentration tested, 100 mg/kg. Radish seeds exposed to the test material at concentrations of 10 and 100 mg/kg took longer to emerge than control seeds. The EC_{50} for growth was 19 mg/kg (95% confidence limits not calculable due to heterogeneity of results). No other phytotoxic effects were observed for any of the species tested."
Statistical Results	"95% confidence limits not calculable due to heterogeneity of results"
Remarks	None

Conclusions

Remarks: "The LC $_{50}$ for emergence and EC $_{50}$ for growth rate were both greater that the highest concentration tested, 100 mg/kg, in wheat and mung bean. In radish, the LC $_{50}$ for emergence was greater that the highest concentration tested, 100 mg/kg. Radish seeds exposed to the test material at concentrations of 10 and 100 mg/kg took longer to emerge than control seeds. The EC $_{50}$ for growth was 19 mg/kg (95% confidence limits not calculable due to heterogeneity of results).

No other phytotoxic effects were observed for any of the species tested."

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid – Terrestrial Plants, Growth Test," July 29, 1998.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	OECD Guideline for Testing Chemicals No. 209
Test Type	Activated Sludge, Respiration Inhibition Test
GLP (Yes/No)	Yes
Year	1998
Microbial Inoculum	Activated Sludge from Haddington Municipal Sewage Works
Exposure Period	3 hours

Statistical Methods	"The respiration rate over the 2 to 10 minute portion of the measurement period was determined by linear regression. Probit transformation was used for percentage inhibition values. The goodness of fit of the probit model was checked via the Pearson chi-squared test statistic. A significant chi-squared test statistic indicates heterogeneity of discrepancies between the observed and expected percentage inhibition values. Neither test statistic was statistically significant at the 1% level."
Remarks	None

Nominal Concentrations	0.30, 0.95, 3.0, 9.5, and 30 p.p.m.
Unit	p.p.m.
Element Value	"The 3 hour EC ₅₀ was found to be greater than 30 p.p.m."
Statistical Results	No inhibition at the highest tested concentration.
Remarks	None

Conclusions

Remarks: "The EC $_{50}$, the concentration at which the respiration rate is 50% of the control respiration rate, was found to be greater than 30 p.p.m. This was selected as the top concentration for the test as it is close to the maximum solubility in water.

The respiration rates for the 2 control vessels were within 15% of each other, and the EC_{50} of the reference material was in the range 5 to 30 p.p.m., meeting the criteria for a valid test."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid – Activated Sludge, Respiration Inhibition Test," April 10, 1998.

Other

None

Health Elements

18. Acute Toxicity

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity: not provided in the study

- the estimated purity based on process knowledge is >99%.

Method

Method	Acute Oral Toxicity in rats as specified in the Regulation
	for the Enforcement of the Federal Hazardous
	Substances Act (16 CFR 1500)
Test Type	Acute Oral Toxicity - Rats
GLP (Yes/No)	No
Year	1987
Species/Strain	Sprague-Dawley Rat (albino)
Sex	10 male
Number of animals	10 male
per sex per dose	
Vehicle	The sample material was dosed as a 25% w/v
	suspension in corn oil.
Route of	Each animal was weighed and dosed by direct
Administration	administration of the experimental material in the
	stomach by gavage.
Remarks	 Age: No age given, but rats used weighed 219 – 240
	grams
	Doses: 5.0 g/kg
	 Doses per time period: One dosage level was
	administered and the rats were allowed food and water
	ad libitum, except overnight prior to treatment when food
	was denied, for the 14 day observation period.
	 Volume administered or concentration: 25% w/v in
	corn oil. Volume: 20 ml/kg
	 Post dose observation period: Observed over 14
	days, several times during the first day, and once daily
	thereafter.

3.7.1	
Value	$LD_{50} > 5.0 \text{ g/kg}$

Number of Deaths at each Dose Level	No deaths occurred during the study.
Remarks	"No animal died following treatment or during the observation period. Clinical changes and observations generally noted in one or more animals during the observation period are as follows: • Fecal stains • Loose mucoid feces with pink sample-like material present • Light brown colored stains around the nose or mouth • Scruffy hair coats • Reddish-brown stains around the nose, mouth, or muzzles • Oily hair coats • Urine stains Body Weight Data: At the end of the observation period, all of the rats had gained weight, from 81 to 112 grams per animal.
	Gross necropsies performed at the end of the study revealed no gross pathological changes."

Remarks: "The acute oral LD_{50} value was found to be greater than 5.0 g/kg in male Sprague – Dawley rats. The material is not classified as toxic by oral administration."

Data Quality

Remarks: None

References

Hill Top Biolabs, Inc., "Acute Oral Toxicity Screen in Rats," July 6, 1987.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	Acute Oral Toxicity test in rats meeting OECD and EEC Guidelines
Test Type	Acute Oral Toxicity - Rats
GLP (Yes/No)	Yes
Year	1990
Species/Strain	Sprague-Dawley Rat
Sex	15 male, 15 female
Number of animals per sex per dose	15 male, 15 female
Vehicle	The sample material was dosed as a suspension in corn oil.
Route of Administration	Each animal was weighed and dosed by direct administration of the experimental material in the stomach by gavage.
Remarks	 Age:6 to 8 weeks old, rats used weighed 153 – 210 grams Doses: 1.0, 2.0, 3.0, 4.0, 5.0 g/kg to 2 male and 2 female rats in dose range study. Main study: 5.0 g/kg to 5 male and 5 female rats Doses per time period: One dosage level was administered for the 14 day observation period. Volume administered or concentration: 10 ml/kg Post dose observation period: Observed over 14 days, frequently during the first day, and once daily thereafter.

Results

Value	$LD_{50} > 5.0 \text{ g/kg}$
Number of Deaths at each Dose Level	No deaths occurred during the study.
Remarks	None

Conclusions

Remarks: "In the main study, no deaths occurred and no abnormalities were detected at necropsy after oral Administration of BuKeto Acid at a dose level of 5.0 g/kg.

Clinical signs, noted ½ hour after dosing, were confined to one male which showed reduced activity.

The median oral lethal dose (LD₅₀) of BuKeto Acid is greater than 5000 mg/kg."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid – Acute Oral Toxicity (LD_{50}) Test in Rats," December 6, 1990.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Acute Dermal Toxicity test in rats meeting OECD and EEC Guidelines
Test Type	Acute Dermal Toxicity - Rats
GLP (Yes/No)	Yes
Year	1990
Species/Strain	Sprague-Dawley Rat
Sex	13 male and 13 female
Number of animals per sex per dose	13 male and 13 female
Vehicle	Undiluted test material
Route of Administration	"The test material was applied evenly onto a gauze dressing which was applied to the shaved back of each rat. Up to at least 10% of the body surface was in contact with the test material. The trunk of the rat was then encircled with a strip of non-irritating tape."

Remarks	 Age: Eight to ten weeks old, rats used weighed 199 - 319 grams Doses: 500, 1000, 1500, and 2000 mg/kg for a Dose range study in 2 male and 2 female rats. Main Study: 5000 mg/kg in 5 male and 5 female rats. Doses per time period: One dosage per 24 hour contact time period. After the 24 contact period the
	 bandage was removed and the area wiped with cotton wool moistened with water to remove any residual test material. Post dose observation period: Observed over 14 days with deaths and overt signs of toxicity recorded. Observed frequently after dosing and subsequently once daily for 14 days. Individual body weights were recorded on the day of treatment and on days 7 and 14.

Value	LD ₅₀ > 2000 mg/kg
Number of Deaths at each Dose Level	No deaths occurred at the 2000 mg/kg dose level
Remarks	None

Conclusions

Remarks: "In the main study, no deaths occurred and no clinical signs were noted after a 24 hour dermal administration, under occlusion, of BuKeto Acid at a dose level of 2000 mg/kg.

The median dermal lethal dose (LD_{50}) of BuKeto Acid in rats is greater than 2000 mg/kg."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: Acute Dermal Toxicity Test in Rats," December 6, 1990.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(diethylamino)-2-hydroxybenzoyl]

Remarks: EtKeto Acid, (CAS No. 5809-23-4), Purity: not provided in the study

- the estimated purity based on process knowledge is >99%.

Method

Method	Primary Skin Irritation Study in rabbits as specified in the
Method	Regulation for the Enforcement of the Federal
	Hazardous Substances Act (16 CFR 1500)
Toot Type	1
Test Type	Primary Skin Irritation - Rabbits
GLP (Yes/No)	No .
Year	1987
Species/Strain	New Zealand White Rabbits
Sex	3 male, 3 female
Number of animals per sex per dose	3 male, 3 female
Vehicle	"The test material was applied moistened with 0.5 ml of saline."
Route of Administration	"Prior to dosing the application sites were prepared by clipping the hair from the saddle area of the rabbits. The abraded areas were prepared by making minor epidermal incisions with a hypodermic needle. The abrasions were sufficiently deep to penetrate the epidermis, but not to induce bleeding. Each patch was held in place with two strips of one-inch adhesive tape. After application of the patches, the trunk of each rabbit was wrapped with rubber dental dam, which was secured with staples. An outer layer of gauze and tape was placed around the trunk of each animal. The animals were fitted with Elizabethan Collars for approximately 24 hours."
Remarks	 Age: young adult, Doses: 0.5 grams Doses per time period: One dosage per 24 hour contact time period. Post dose observation period: Evaluated the test sites after 24 hours and again after 72 hours. Evaluated for corrosion, erythema, and edema.

Value	Primary Irritation Index: 0.3
Remarks	None

Remarks: "The Primary Irritation Index was found to be 0.3 based on erythema and edema. No evidence of tissue damage was found. The material is not classified as a primary irritant or as a corrosive by dermal application."

Data Quality

Remarks: None

References

Hill Top Biolabs, Inc., "Primary Skin Irritation Acid in Rabbits of EtKeto," July 6, 1987.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Acute Dermal Irritation test in rabbits meeting OECD and EEC Guidelines
Test Type	Acute Dermal Irritation - Rabbits
GLP (Yes/No)	Yes
Year	1990
Species/Strain	New Zealand White Rabbits
Sex	2 male, 1 female
Number of animals per sex per dose	2 male, 1 female
Vehicle	"The test material was applied moistened with 0.5 g of water."

Route of Administration	"The hair was clipped from the dorsal area of the trunk of each rabbit approximately 24 hours before treatment. Care was taken to avoid abrading the skin. The test material (0.5 g, moistened with water), was applied to intact skin on each rabbit under a 2.5 cm x 2.5 cm patch of gauze. The patch was then covered with Micropore tape and the trunk was loosely bound with Elastoplast Elastic Bandage which remained in position for 4 hours. At the end of this period the patches were removed and the skin wiped with water dampened tissues to remove surplus test material without altering the existing response or the integrity of the epidermis."
Remarks	 Age: young adult Doses: 0.5 grams Doses per time period: One dosage per 4 hour contact time period. Post dose observation period: Skin reactions were assessed 1, 24, 48, and 72 hours after patch removal.

Value	"BuKeto Acid is non-irritant to rabbit skin."
Remarks	None

Conclusions

Remarks: "No skin reactions were noted following a 4 hour semi-occlusive application of BuKeto Acid to rabbit skin. BuKeto Acid is non-irritant to rabbit skin."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: Acute Dermal Irritation Test in Rabbits," December 6, 1990.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method

Method	Acute Eye Irritation Test in rabbits meeting OECD and
	EEC Guidelines
Test Type	Acute Eye Irritation - Rabbits
GLP (Yes/No)	Yes
Year	1990
Species/Strain	New Zealand White Rabbits
Sex	1 male, 2 female
Number of animals per sex per dose	3 rabbits – 1 male, 2 female
Vehicle	Undiluted test material
Route of Administration	"Approximately 24 hours before test commencement, both eyes of rabbits were examined and only animals with no ocular defects were used in the test. The quantity of material instilled into the treated eye was 100 mg. Instillation of the test material was by the following technique: The rabbit was held firmly but gently and the test material placed into the right eye by gently pulling the lower eyelid away from the eyeball to form a sac into which the test material was dropped. The lids were then gently held together for one or two seconds. The other eye remained untreated to serve as a control."
Remarks	 Age: young adult Doses: 100 mg Doses per time period: One dosage per 72 hour observation period. Post dose observation period: Assessment of damage/irritation was made 1, 24, 48, and 72 hours following treatment.

Results

Value	"BuKeto Acid is practically non-irritant to rabbit eyes."
Remarks	None

Conclusions

Remarks: "Slight conjuctival redness was noted in all treated eyes 1 hour post instillation, persisting in one eye until 24 hours when a slight discharge was also

noted. All treated eyes were normal by 48 hours post instillation. BuKeto Acid is practically non-irritant to rabbit eyes."

Data Quality

Remarks: None

References

Inveresk Research International, "Buketo Acid: Acute Eye Irritation Test in Rabbits," December 6, 1990.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Maximization Technique (Magnusson and Kligman), satisfies OECD Guidelines
Test Type	Magnusson-Kligman Maximization Test in Guinea Pigs
GLP (Yes/No)	Yes
Year	1990
Species/Strain	Dunkin-Hartley albino guinea pigs
Sex	48 female
Number of animals per sex per dose	48 female guinea pigs
Vehicle	Paraffin oil
Route of Administration	Injection Induction: 10%, 5%, 2%, and 1% w/v BuKeto Acid in paraffin oil at 0.1 ml Topical Induction: 25%, 10%, 5%, and 2% w/v BuKeto Acid in paraffin oil at 0.1 ml Primary Challenge: 25% and 10% w/v BuKeto Acid in paraffin oil at 0.1 ml

Remarks	 Age: young adult, Guinea pigs used weighed 411 – 503 grams Doses: Injection: 0.1 ml, Topical: 0.1 ml, Challenge: 0.1 ml Doses per time period: One dosage per 24 to 48 hour observation period. Post dose observation period: Assessment of
	damage/irritation was made 24, 48 hours following treatment.

Value	"BuKeto Acid is classified as a weak sensitiser according to the Magnusson-Kligman classification"
Remarks	None

Conclusions

Remarks: "There is no evidence from the test results that BuKeto Acid is a sensitiser in guinea pigs. BuKeto Acid is classified as a weak sensitiser according to the Magnusson-Kligman classification."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: Magnusson-Kligman Maximization Test in Guinea Pigs," December 6, 1990.

Other

None

Genetic Toxicity Elements

19. Genetic Toxicity In Vivo

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99%

Method	In Vivo Rat Liver Unscheduled DNA Synthesis Assay (Butterworth BE, Ashby J, Bermudez E, Casciano D, Mirsalis J, Probst G, Williams GM, 1987), Mutation Research, 189, 123-133
Test Type	In Vivo Rat Liver Unscheduled DNA Synthesis Assay
GLP (Yes/No)	Yes
Year	1998
Species/Strain	Male Alderley Park (Alpk: Ap _f SD) rats
Sex	male
Route of Administration	Single oral dose
Doses/concentration levels	3200 and 5000 mg/kg
Exposure period	2 hours and 16 hours
Statistical methods	"The computer system calculated the mean nuclear grain count [N], the mean cytoplasmic grain count [C], the mean net nuclear grain count [N-C] and the percentage of cells in repair (i.e. cells with N-C values of at least 5) for each slide, animal and treatment group."
Remarks	 Age: Six to seven weeks old No. animals per dose: 5 rats at 3200 mg/kg and 16 hours, 5 rats at 5000 mg/kg and 16 hours, 5 rats at 3200 mg/kg and 2 hours, 5 rats at 5000 mg/kg and 2 hours Vehicle: Corn oil Duration of test: 4 days Frequency of treatment: Single oral dose Control groups and treatment: Corn oil vehicle control (20 ml/kg) at 16 hours and 2 hours, 1,2-dimethylhydrazine dihydrochloride (positive control) (30 ml/kg) at 16 hours and 2 hours Clinical observations: Signs of coloration or abnormalities to organ/tissues Organs examined at necropsy: Liver tissue Criteria for evaluating results: Nuclear grain count, mean cytoplasmic grain count, mean net nuclear grain count, and the percentage of cells in repair for each slide, animal and treatment group Criteria for selection of M.T.D.: "The maximum tolerated dose (MTD) was selected as 5000 mg/kg which is the limit dose for the assay."

UDS Assay and	"Signs of diarrhea was observed for some rats dosed at
Statistical results	3200 mg/kg and 5000 mg/kg. One rat dosed at 3200
	mg/kg showed signs of urinary incontinence.
	Mean viablities of the hepatocyte cultures ranged from 73.2% to 77.7%.
	Hepatocytes prepared from all animals were examined
	microscopically. No apparent signs of excessive
	cytotoxicity (e.g. few cells present, a high proportion of cells of abnormal morphology or large number of
	pyknotic cells) were observed on slides from animals
	dosed with BuKeto Acid. Slides from animals treated
	with BuKeto Acid at both dose levels were therefore
	assessed for UDS.
	BuKeto Acid caused no significant increases, compared
	to the vehicle control, in mean net nuclear grain count,
	or in percentage of cells in repair, at either dose level or
	time point investigated. Hepatocytes from BuKeto Acid
	treated animals had mean net nuclear grain values of
	less than 0. These data therefore provided no evidence
Daniela	for induction of UDS by BuKeto Acid."
Remarks	"The sensitivity of the test system was clearly
	demonstrated by the marked increases in DNA repair
	(as measured by UDS) induced in the positive control
	substance, 1,2-dimethylhydrazine dihydrochloride."

Remarks: "Under the conditions of the test, BuKeto Acid did not induce DNA repair (as measured by unscheduled DNA synthesis) in rat liver *in vivo*."

Data Quality

Remarks: None

References

Central Toxicology Laboratory, "BuKeto Acid: In Vivo Rat Liver Unscheduled DNA Synthesis Assay," August 7, 1998.

Other

None

20. Genetic Toxicity In Vitro

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Chromosomal Aberrations Assay with Chinese Hamster Ovary Cells <i>in vitro</i>
Test Type	Chromosome Aberrations in Chinese Hamster Ovary (CHO) Cells (Cytogenetic assay)
System of Testing	Chinese Hamster Ovaries
GLP (Yes/No)	Yes
Year	1991
Species/Strain	Chinese Hamster Ovary (CHO-10 B ₄), State University of Leiden, Netherlands
Metabolic Activation	Species and cell type: Aroclor 1254 – induced rat liver S-9 (male Fischer 344 rat) Quantity: 50 µl at 0.5 ml Induced or not induced: Studied induced and non-induced cells
Concentrations Tested	Presence of S-9 Mix: 5, 10, 20 and 30 μg/ml Absence of S-9 Mix: 25, 50, 75, and 100 μg/ml

Statistical Mathada	"Statistical avaluation of in bayes historical data from
Statistical Methods	"Statistical evaluation of in-house historical data from vehicle and untreated control cultures has enabled acceptable aberration frequency ranges for a negative response to be defined. A negative test substance response was recorded if the measured aberration parameter fell within 95% confidence limits of mean historical values of vehicle control cultures. A positive response was recorded whenever aberration incidences in treated cultures repeatedly equaled or rose above the upper 99% confidence limits of mean historical values of vehicle control cultures. Importance was also placed on the demonstration of dose related and reproducible increases in the assessed aberration parameters. Sporadic increases in structural aberrations in compound treated cultures whether over the 95% or 99% confidence levels were discussed individually. Where control values fell between 95 and 99% limits, the frequency was deemed elevated. The responses to the test and positive control substances were then judged as positive if a doubling over these elevated control frequencies were achieved. A test was rejected if vehicle or medium-only control values fell outside the upper 99% confidence limits for 2 of the 3 measured aberration parameters. Similarly, a test was rejected if positive control values (for at least one positive control) were not in excess of the upper 99% confidence limits
December	for 2 of the 3 measured parameters shown."
Remarks	Metaphases Examined: "The chromosome aberration assay was performed using standard procedures by exposing duplicate cultures of CHO cells to the test article as well as positive, solvent, and untreated controls. CHO cells were seeded at approximately 0.1 x 10 ⁶ cells/ml. The test article solvent vehicle was dimethyl sulfoxide (DMSO).

Cytotoxic	With metabolic activation: "In the presence of S9 mix
concentration	BuKeto Acid was a potent inducer of chromosomal
	aberrations when tested at toxic concentrations of 20
	and 30 μg/ml."
	Without metabolic activation: no test concentration
	caused aberrations

Statistical Results	"In the presence of S9 mix BuKeto Acid was a potent inducer of chromosomal aberrations when tested at toxic concentrations of 20 and 30 µg/ml. This response was dose related. There was no evidence that BuKeto Acid induced chromosomal aberrations in the absence of the S9 mix."
Remarks	"Concurrent vehicle and positive control cultures demonstrated the sensitivity of the test system." The solvent control used was cyclophosphamide (CPH). The test article solvent vehicle was dimethyl sulfoxide (DMSO).

Remarks: "It was concluded that BuKeto Acid was clastogenic *in vitro* when tested for such effects, to toxic concentrations, in the presence of S9 mix with an established Chinese hamster ovary (CHO) cell line."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: Chromosomal Aberrations Assay with Chinese Hamster Ovary Cells *in vitro*" July 12, 1991.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Salmonella/Mammalian-Microsome Mutagenicity Assay (McCann et al., 1975; McCann and Ames, 1975)
Test Type	Testing for Mutagenic Activity with Salmonella typhimurium
System of Testing	Salmonella typhimurium
GLP (Yes/No)	Yes

Year	1991
Species/Strain	Salmonella typhimurium, TA98, TA100, TA1535, TA1537, and TA 1538
Metabolic Activation	Species and cell type: Aroclor 1254 – induced rat liver S-9 (male Fischer 344 rat) Quantity: 0.5 ml to 2 ml of molten agar Induced or not induced: Studied induced and non-induced cells
Concentrations Tested	Toxicity test: 33, 100, 333, 1000, 3333, 10000 µg per plate Mutation test: 3, 10, 33, 100, 333, 1000 µg per plate
Statistical Methods	For all replicate platings, the mean revertants per plate and the standard deviation will be calculated.
Remarks	Number of Replicates: triplicate

Genotoxic effects concentration	"No mutagenic activity was observed in any of the 5 bacterial strains used, either in the presence or absence of S9 mix. Toxicity to the bacteria was observed 1000 µg per plate in both activation systems.
Statistical Results	No appreciable toxicity was observed. No positive responses were observed.
Remarks	The test article solvent vehicle was dimethyl sulfoxide (DMSO). The results obtained in the positive control groups were within the normal ranges expected for each bacterial strain and activation system.

Conclusions

Remarks: "It was concluded that BuKeto Acid was not mutagenic to Salmonella typhimurium when tested in dimethylsulphoxide at concentrations extending into the toxic range."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: Testing for Mutagenic Activity with *Salmonella typhimurium* TA 1535, TA 1537, TA 1538, TA 98, and TA 100," August 31, 1990.

Other

None

21. Repeated Dose Toxicity

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity >99%

Method	Four Week Oral Toxicity Study in Rats conforms with Annex V, published in the Official Journal of the European Communities (no. L251, 19, September 1984)
Test Type	28 Day Oral Toxicity Study in Rats
GLP (Yes/No)	Yes
Year	1990
Species/Strain	Sprague-Dawley Rats
Route of Administration	The test substance was administered once daily orally via a steel cannula at a constant dose volume of 5 ml dosing suspension per kg body weight.
Duration of test	28 days
Doses/concentration levels	Dose volume: 5 ml/kg/day Dose Levels: 0, 50, 250, and 1000 mg/kg/day
Sex	23 male and 23 female
Exposure period	Animals were treated once daily, seven days per week for four weeks.
Frequency of treatment	The test substance was administered once daily orally via a steel cannula at a constant dose volume of 5 ml dosing suspension per kg body weight.
Control group and treatment	Control animals similarly received 5 ml per kg body weight of corn oil (vehicle).

Post exposure observation period	"Viability was checked once each morning and once as late as practicable on each day. All animals were examined for reaction to treatment during each day. The onset, intensity and duration of these signs were recorded. All animals received a detailed clinical examination once each week. The weight of each animal was recorded weekly. The quantity of food consumed by each cage of animals was recorded once each week. Water consumption was monitored by visual inspection on a weekly basis thought the study. All animals were killed and necropsied."
Statistical methods	"Hematology, clinical chemistry, organ weight and body weight data were statistically analyzed for homogeneity of variance using the 'F-max' test. If the group variances appeared homogenous a parametric ANOVA was used and pairwise comparisons made via Student's t-test using Fisher's F-protected LSD. If the variances were heterogeneous log or square root transformations were used in an attempt to stabilize the variances. If the variances remained heterogeneous then a non-parametric test such as Kruskal-Wallis ANOVA was used. Organ weights were also analyzed conditional on body weight (i.e. analysis of covariance). Histology data were analyzed by Fisher's Exact Probability test."
Remarks	 Age: 4 weeks old, rats used weighed: male – ca 85 grams, female – ca 60 grams No. of animals per sex per dose: 23 males, 23 females Vehicle: corn oil Clinical observations performed and frequency: All animals were observed daily for reactions to treatment. Organs examined at necropsy: adrenals, heart, kidneys, liver, spleen, testes, ovaries, any other macroscopically abnormal tissue

NOAEL (NOEL)	"There were no notable effects seen at 50 mg/kg/day or 250 mg/kg/day in males or at any dose level in females."
LOAEL (LOEL)	"BuKeto Acid produced a moderate reduction in body weight gain with a concomitant slight reduction in food consumption at 1000 mg/kg/day in males only."

Actual dose received by dose level by sex	0, 50, 250, and 1000 mg/kg/day
Toxic response/effects by dose level	"There was a moderate reduction in body weight gain in the male high dose group. There was a slight reduction in total food consumed in the male high dose group."
Statistical results	"There was a moderate reduction in body weight gain in the male high dose group. There was a slight reduction in total food consumed in the male high dose group."
Remarks	 Body weight: There was a moderate reduction in body weight gain in the male high dose group Food/water consumption: There was a slight reduction in total food consumed in the male high dose group Description, severity, time of onset and duration of clinical signs: No notable differences in either sex Ophthalmologic findings incidence and severity: No notable differences in either sex Haematological findings incidence and severity: No notable differences in either sex Clinical biochemistry findings incidence and severity: No notable differences in either sex Mortality and time to death: No notable differences in either sex Gross pathology incidence and severity No notable differences in either sex Organ weight changes: No notable differences in either sex Histopathology incidence and severity: No notable differences in either sex

Remarks: "Dosing Sprague-Dawley rats for 4 weeks with BuKeto Acid produced a moderate reduction in body weight gain with a concomitant slight reduction in food consumption at 1000 mg/kg/day in males only.

There were no notable effects seen in 50 mg/kg/day or 250 mg/kg/day in males or at any dose level in females."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: 4 Week Oral Toxicity Study in Rats," November 30, 1990.

Other

None

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.9%

Method	Thirteen Week Oral Toxicity Study in Rats conforms with OECD Guidelines
Test Type	13 Week Oral Toxicity Study in Rats
GLP (Yes/No)	Yes
Year	1998
Species/Strain	Sprague-Dawley Rats (CD BR)
Route of Administration	The test substance was administered once daily by the oral gavage route, 7 days per week for 13 consecutive weeks.
Duration of test	13 weeks
Doses/concentration levels	Dose volume: 5 ml/kg/day Dose Levels: 0, 50, 250, and 1000 mg/kg/day
Sex	43 male and 43 female
Exposure period	Animals were treated once daily, seven days per week for thirteen weeks.
Frequency of treatment	The test substance was administered once daily orally by gavage at a constant dose volume of 5 ml dosing suspension per kg body weight.
Control group and treatment	Control animals similarly received 5 ml per kg body weight of corn oil (vehicle).

Doot ovposure	"Viability was absolved appealable marning and area as
Post exposure observation period	"Viability was checked once each morning and once as late as practicable on each day. All animals were examined for reaction to treatment during each day. The onset, intensity and duration of these signs were recorded. All animals received a detailed clinical examination once each week. The weight of each animal was recorded weekly. The quantity of food consumed by each cage of animals was recorded once each week. Water consumption was monitored by visual inspection on a weekly basis throughout the study. However, after an observation on week 7 the water consumption was recorded from week 8 to the end of the study. All animals were killed and necropsied."
Statistical methods	"Body weight, food consumption, haematology, coagulation, urinalysis, clinical chemistry, and organ weight data were statistically analyzed for homogeneity of variance using the 'F-max' test. If the group variances appeared homogenous a parametric ANOVA was used and pairwise comparisons made via Student's t-test using Fisher's F-protected LSD. If the variances were heterogeneous log or square root transformations were used in an attempt to stabilize the variances. If the variances remained heterogeneous then a non-parametric test such as Kruskal-Wallis ANOVA was used. Organ weights were also analyzed conditional on body weight (i.e. analysis of covariance). Histology data were analyzed by Fisher's Exact Probability test."
Remarks	 Age: 4 weeks old, rats used weighed: male – ca 83-87 grams, female – ca 58-62 grams No. of animals per sex per dose: 43 males, 43 females Vehicle: corn oil Clinical observations performed and frequency: All animals were observed daily for reactions to treatment. Organs examined at necropsy: adrenals, heart, kidneys, liver, spleen, testes, ovaries, brain, eye, gastrointestinal tract, lung, pancreas, pituitary, prostrate, skin, spinal cord, sternum, thigh muscle, thymus, thyroid, tongue, trachea, bladder, uterus, vagina, any other macroscopically abnormal tissue

NOAEL (NOEL)	"There were no signs of toxicity at 50 mg/kg/day, which
,	was therefore classed as the No Toxic Effect Level."
LOAEL (LOEL)	"At 250 mg/kg/day males and females showed signs of salivation and body weight gain reduction as well as
	increased water consumption in females only."
Actual dose received by dose level by sex	0, 50, 250, and 1000 mg/kg/day
Toxic response/effects by dose level	"No treatment related differences were seen in haematology, clinical chemistry and urinalysis parameters or in post mortem investigations. Males and females receiving 1000 mg/kg/day showed signs of gastro-intestinal disturbance and salivation, body weight gain was slightly reduced and water consumption was increased in both sexes. At 250 mg/kg/day males and females showed signs of salivation and body weight gain reduction as well as increased water consumption in females only."
Statistical results	"No treatment related differences were seen in haematology, clinical chemistry and urinalysis parameters or in post mortem investigations. Males and females receiving 1000 mg/kg/day showed signs of gastro-intestinal disturbance and salivation, body weight gain was slightly reduced and water consumption was increased in both sexes. At 250 mg/kg/day males and females showed signs of salivation and body weight gain reduction as well as increased water consumption in females only."
Remarks	 Body weight: Body weights and gains were slightly reduced at 250 and 1000 mg/kg/day as compared to controls in males Food/water consumption: No notable differences in either sex. There was a moderate increase in water consumption at 1000 mg/kg/day in males and at 250 and 1000 mg/kg/day in females Description, severity, time of onset and duration of clinical signs: No notable differences in either sex Ophthalmologic findings incidence and severity: No notable differences in either sex Hematological findings incidence and severity: No notable differences in either sex Clinical biochemistry findings incidence and severity: No notable differences in either sex Mortality and time to death: No notable differences in either sex Gross pathology incidence and severity No notable differences in either sex

 Organ weight changes: No notable differences in males. Slight increase in thyroid and liver weight in males. Not substantiated by histological lesion. Histopathology incidence and severity: No notable
differences in either sex

Remarks: "It was concluded from observations, laboratory investigations and terminal studies that dosing Sprague-Dawley rats orally by gavage for 13 weeks at levels of 250 and 1000 mg/kg/day produced only signs of mild toxicity attributable to BuKeto Acid."

Data Quality

Remarks: None

References

Inveresk Research International, "BuKeto Acid: 13 Week Oral Toxicity Study in Rats with Administration by Gavage," October 2, 1998.

Other

None

22. Toxicity to Reproduction

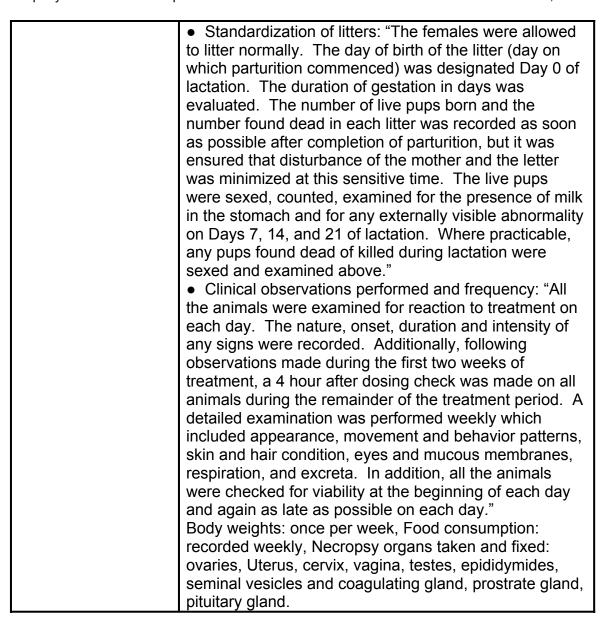
Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.9%

Method	OECD Guidelines for Testing Chemicals No. 415
Test Type	One generation reproductive test
GLP (Yes/No)	Yes
Year	1999
Species/Strain	Sprague-Dawley rats
Route of Administration	Doses were administered orally by gavage at a dose volume of 5 ml dosing solution per kg body weight, using a steel dosing cannula.

Doses/concentration levels	Dose volume: 5 ml/kg bodyweight (Suspension in corn oil) Dose Levels: 0 (Control), 50, 250, and 1000 mg/kg/day
Sex	104 male and 104 female
Control group and	24 male and 24 female
treatment	Dose: 5 ml/kg bodyweight (corn oil)
Frequency of	The once daily doses were administered ten weeks prior
treatment	to pairing, through pairing, pregnancy, and lactation up to sacrifice after weaning of their offspring.
Duration of test	21 weeks (21 day post partum)
Premating exposure period for males	10 weeks
Premating exposure period for females	10 weeks
Statistical methods	"Where required to assist the interpretation, tests were applied to determine the statistical significance of observed differences between controls and treated groups. Organ weight data were analyzed by analysis of variance and by analysis of covariance using the terminal body weight as the single covariate. Pairwise comparisons between each treatment level and control were performed using Fisher's F-Protected T-test. For other parameters, interpretation was based on examination of the individual group values."
Remarks	 Age: 4 weeks old, males used weighed 61 - 96 grams, females weighed: 53 - 82 grams No. of animals per sex per dose: 24 males, 24 females Vehicle: corn oil Dosing schedule and pre and post dosing observation periods: The once daily doses were administered ten weeks prior to pairing, through pairing, pregnancy, and lactation up to sacrifice after weaning of their offspring. Observed through 21 day post partum. (21 weeks) Mating procedures (M/F ratios per cage, length of cohabitation, proof of pregnancy): One male and one female, 7 night mating period, daily vaginal smears to determine proof of pregnancy



NOAEL (NOEL)	"There were no reproductive effects detected at 50 mg/kg/day."
LOAEL (LOEL)	"Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day."
Actual dose received by dose level by sex	"The analyzed concentrations of dosing suspensions were within ± 10% of the nominal concentration, indicating acceptable accuracy of formulation."
Parental data, descriptions	"Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day."

Offspring toxicity	"At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Toxic response/effects by dose level	"Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feaces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased. At 50 mg/kg/day, pup mortality was similar to control. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Statistical results	"Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feaces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased.

	At 50 mg/kg/day, pup mortality was similar to control. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Remarks	Body weight: "Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feaces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels." Food/water consumption: Similar to those of control animals Fertility index: Similar to those of control animals Gestation index: Similar to those of control animals Mortality: The incidence of deaths at 100 mg/kg/day was much greater than would be expected in Control animals and therefore the deaths at this level were attributed to BuKeto Acid. Gross pathology incidence and severity: Similar to those of control animals Ovarian weight changes: Similar to those of control animals Ovarian weight changes: Similar to those of control animals Ovarian weight changes: Similar to those of control animals Offspring toxicity: At 1000 mg/kg/day pup mortality was indicated by the loss of complete litters, but 250
	mg/kg/day the susceptible litters only lost some of their pups.

Litter size and weights: At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting).
the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels. • Organ weights: Similar to those of control animals

Remarks: "Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day. There were no reproductive effects detected at 50 mg/kg/day."

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid: One Generation Reproduction Study in Rats," March 25, 1999.

Other

None

23. Developmental Toxicity

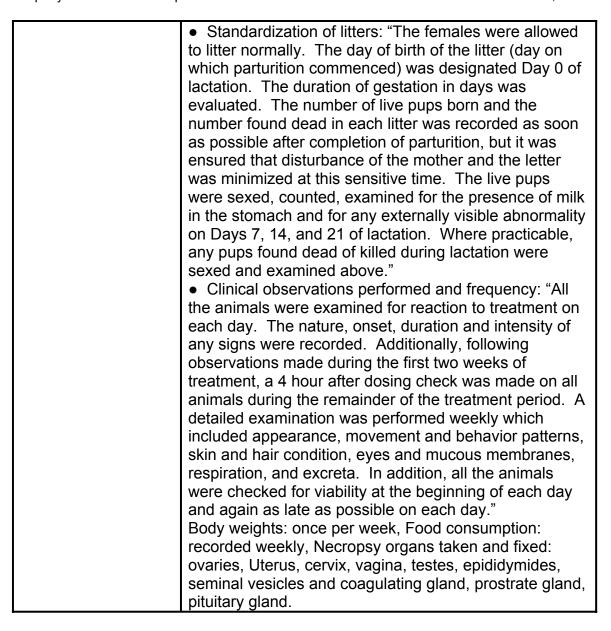
Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Purity 99.9%

Method	OECD Guidelines for Testing Chemicals No. 415
Test Type	One generation reproductive test
GLP (Yes/No)	Yes
Year	1999
Species/Strain	Sprague-Dawley rats

Route of Administration	Doses were administered orally by gavage at a dose volume of 5 ml dosing solution per kg body weight, using a steel dosing cannula.
Doses/concentration levels	Dose volume: 5 ml/kg bodyweight (Suspension in corn oil) Dose Levels: 0 (Control), 50, 250, and 1000 mg/kg/day
Sex	104 male and 104 female
Control group and treatment	24 male and 24 female Dose: 5 ml/kg bodyweight (corn oil)
Frequency of treatment	The once daily doses were administered ten weeks prior to pairing, through pairing, pregnancy, and lactation up to sacrifice after weaning of their offspring.
Duration of test	21 weeks (21 day post partum)
Premating exposure period for males	10 weeks
Premating exposure period for females	10 weeks
Statistical methods	"Where required to assist the interpretation, tests were applied to determine the statistical significance of observed differences between controls and treated groups. Organ weight data were analyzed by analysis of variance and by analysis of covariance using the terminal body weight as the single covariate. Pairwise comparisons between each treatment level and control were performed using Fisher's F-Protected T-test. For other parameters, interpretation was based on examination of the individual group values."
Remarks	 Age: 4 weeks old, males used weighed 61 - 96 grams, females weighed: 53 - 82 grams No. of animals per sex per dose: 24 males, 24 females Vehicle: corn oil Dosing schedule and pre and post dosing observation periods: The once daily doses were administered ten weeks prior to pairing, through pairing, pregnancy, and lactation up to sacrifice after weaning of their offspring. Observed through 21 day post partum. (21 weeks) Mating procedures (M/F ratios per cage, length of cohabitation, proof of pregnancy): One male and one female, 7 night mating period, daily vaginal smears to determine proof of pregnancy



NOAEL (NOEL)	"There were no reproductive effects detected at 50 mg/kg/day."
LOAEL (LOEL)	"Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day."
Actual dose received by dose level by sex	"The analyzed concentrations of dosing suspensions were within ± 10% of the nominal concentration, indicating acceptable accuracy of formulation."
Parental data, descriptions	"Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day."

Officialists to the said of the	"At 050 and 4000 mag/light days are a significant."
Offspring toxicity	"At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Toxic response/effects by dose level	"Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feaces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased. At 50 mg/kg/day, pup mortality was similar to control. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Statistical results	"Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feaces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased.

	At 50 mg/kg/day, pup mortality was similar to control. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels."
Remarks	Body weight: "Mean body weight gain of males was reduced at 1000 and 250 mg/kg/day. There was a slightly reduced initial weight gain at 1000 mg/kg/day. Clinical signs of reaction at these levels included unkempt/greasy coats and soft feces. At 1000 mg/kg/day, reduced weight gain was observed during gestation. All pups in 8/21 litters at this level died or were killed, and 3 dams were killed at around the same time; a further dam was killed during parturition. In the surviving litters, pup survival was similar to control. At 250 mg/kg/day, weight gain during gestation was slightly reduced. The incidence of litters in which all pups died was similar to control, but pup mortality in the surviving litters was increased. At 250 and 1000 mg/kg/day, mean litter weights were lower than control, although mean pup weights were only slightly lower at 1000 mg/kg/day and increased at 250 mg/kg/day (reflecting the smaller litter sizes). It was considered that there had probably been a marginal effect of treatment on litter/pup weights at these levels." Food/water consumption: Similar to those of control animals Fertility index: Similar to those of control animals Duration of gestation: Similar to those of control animals Mortality: The incidence of deaths at 100 mg/kg/day was much greater than would be expected in Control animals and therefore the deaths at this level were attributed to BuKeto Acid. Gross pathology incidence and severity: Similar to those of control animals Ovarian weight changes: Similar to those of control animals Ovarian weight changes: Similar to those of control animals Offspring toxicity: At 1000 mg/kg/day pup mortality was indicated by the loss of complete litters, but 250 mg/kg/day the susceptible litters only lost some of their
	pups.

,	 Litter size and weights: At 250 and 1000 mg/kg/day,
	mean litter weights were lower than control, although
	mean pup weights were only slightly lower at 1000
	mg/kg/day and increased at 250 mg/kg/day (reflecting
,	the smaller litter sizes). It was considered that there had
,	probably been a marginal effect of treatment on
	litter/pup weights at these levels.
	 Organ weights: Similar to those of control animals

Remarks: "Under the conditions of this study, parental toxicity and reproductive effects were observed at 250 and 1000 mg/kg/day. There were no reproductive effects detected at 50 mg/kg/day."

Data Quality

Remarks: None

References

Inveresk Research, "BuKeto Acid: One Generation Reproduction Study in Rats," March 25, 1999.

Other

None

Toxicokinetic Assessment

24. Toxicokinetic Assessment

Test Substance

Identity: Benzoic acid, 2-[4-(dibutylamino)-2-hydroxybenzoyl]

Remarks: BuKeto Acid, (CAS No. 54574-82-2), Review of other studies with

Purities >99%

Method	Assessment of the adsorption, distribution, metabolism, and excretion of BuKeto Acid
GLP (Yes/No)	No
Year	2001

Studies reviewed	Physico-chemical properties, Acute Oral Toxicity, Acute Dermal Toxicity, Skin Irritation, Eye Irritation, Subacute Toxicity (28 day test), One Generation Reproduction Study, 13 Week Oral Toxicity in Rats, Rat Hepatocyte UDS Assay, Mutagenicity
Remarks	None

Assessment	"Lack of clinical signs in the toxicity tests may indicate poor absorption of lack of inherent toxicity. The substance is a weak acid. At the pH in the stomach (<i>ca</i> 1.4) it will be non-ionized and highly lipid soluble, therefore absorption may occur. In other regions of the gastro-intestinal tract, where the pH is higher, absorption is likely to be substantially reduced. At skin pH (<i>ca</i> 5.5) the partition coefficient of the substance will be quite high (Log P _{ow} <i>ca</i> 5) and absorption into the systemic circulation is unlikely. Although it may penetrate the outer layers of the stratum corneum. Once in the blood stream at plasma pH, the substance is likely to be ionized, although the log P _{ow} at pH 7 (2.67) indicates that this still has appreciable soluble lipid solubility. This indicates that, once absorbed into the bloodstream, the substance may be capable of partitioning into fatty tissues and possibly remaining there. However no evidence of tissue abnormalities was observed in the studies."
Remarks	None

Conclusions

Remarks: "At pH 7, the substance has reasonable water solubility but still greater affinity for lipid media rather than aqueous (log P_{ow} is 2.67). The substance may be excreted unchanged via the kidney, however, metabolism to form more water soluble/polar compounds which could result in more rapid excretion is likely. Demethylation or dealkylation of the side chains may occur, while N-dealkylation is also possible. The linked aromatic rings may undergo phase II conjugation reactions, with the hydroxyl mostly conjugated to glucuronide and the carboxyl to glucuronide or glycine."

Data Quality

Remarks: None

References

Inveresk Research, "Toxicokinetic Assessment of BuKeto Acid," January 10, 2001

Other

None